

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SIGNODE INDUSTRIAL GROUP LLC,

Plaintiff,

v.

SAMUEL, SON & CO., LTD., ET AL.

Defendants.

Case No. 2:24-CV-00080-JRG

**DECLARATION OF DEVON C BEANE IN SUPPORT OF SIGNODE INDUSTRIAL
GROUP LLC'S OPPOSITION TO SAMUEL'S MOTION TO TRANSFER PURSUANT TO
28 U.S.C. § 1404(a)**

I, Devon C. Beane, declare:

1. I am a Partner with the law firm of K&L Gates LLP, and I am counsel of record for Plaintiff Signode Industrial Group LLC (“Signode”) in the above-captioned matter. I am submitting this declaration in support of Signode’s Opposition To Samuel’s Motion To Transfer Pursuant To 28 U.S.C. § 1404(a). I have personal knowledge of the matters stated herein and, if called to testify to such matters, I could and would testify hereto.

2. Attached as Exhibit A is a true and correct copy of a picture of the shipping label on the shipping container, in which, the STL-500 was shipped to 110 North College Ave., Tyler, TX 75702, which is located in the District.

3. Attached as Exhibit B is a true and correct copy of excerpts from Samuel’s Objections and Responses to Signode Industrial Group LLC’s First Set of Interrogatories 1-8.

4. Attached as Exhibit C is a true and correct copy of driving instructions from Signode’s Tampa Headquarters to the Sam B. Hall Jr. Federal Building and United States Courthouse as generated by Google Maps.

5. Attached as Exhibit D is a true and correct copy of driving instructions from Signode’s Tampa Headquarters to the Dirksen Federal Building located in Chicago, IL as generated by Google Maps.

6. Attached as Exhibit E is a true and correct copy of statistics concerning patent cases in the Eastern District of Texas as generated by Lex Machina on September 1, 2024.

7. Attached as Exhibit F is a true and correct copy of statistics concerning patent cases in the Northern District of Illinois as generated by Lex Machina on September 1, 2024.

8. Attached as Exhibit G is a true and correct copy of Signode’s First Amended Initial and Additional Disclosures.

I certify under penalty of perjury under the laws of the United States that the foregoing statements are true and correct. Signed this 4th day of September, 2024.

/s/ Devon C. Beane
Devon C. Beane

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a) and served via electronic mail on all counsel of record on this 4th day of September, 2024.

/s/ Devon C. Beane
Devon C. Beane